BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY Docket No. R97-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (September 2, 1997)

The United States Postal Service hereby objects partially to interrogatory OCA/ USPS-T22-22(c) on the grounds of vagueness and overbreadth, and on the grounds of the deliberative process privilege.

The interrogatory requests "all documents relating to the decision to use the new scanners for delivery confirmation." The Postal Service intends to provide an affirmative response to the interrogatory, which generally inquires into a change in technology proposed for use with delivery confirmation. However, it is confident that "all" documents—particularly those shielded by the deliberative process privilege—will not be provided.

WHEREFORE, the United States Postal Service objects partially to interrogatory OCA/USPS-T22-22(c).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083; Fax –5402 September 2, 1997